

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION**

Civil Action No. 15-7658

JUDGE MICHAEL A. SHIPP
JUDGE LOIS H. GOODMAN

JUDGE DENNIS CAVANAUGH, RET.
SPECIAL MASTER

THIS DOCUMENT RELATES TO:

15-cv-07658 (MAS) (LHG)
16-cv-07321 (MAS) (LHG)
16-cv-07324 (MAS) (LHG)
16-cv-07494 (MAS) (LHG)
16-cv-07497 (MAS) (LHG)
17-cv-06513 (MAS) (LHG)
17-cv-07636 (MAS) (LHG)
17-cv-12088 (MAS) (LHG)
18-cv-00089 (MAS) (LHG)
18-cv-00343 (MAS) (LHG)
18-cv-00383 (MAS) (LHG)
18-cv-00846 (MAS) (LHG)
18-cv-00893 (MAS) (LHG)
18-cv-01223 (MAS) (LHG)
18-cv-08595 (MAS) (LHG)
18-cv-08705 (MAS) (LHG)
18-cv-15286 (MAS) (LHG)
20-cv-07460 (MAS) (LHG)
20-cv-07462 (MAS) (LHG)

**NOTICE OF DEFENDANTS' MOTION FOR A PROTECTIVE ORDER TO PRECLUDE
THE DEPOSITION OF JOSEPH C. PAPA**

PLEASE TAKE NOTICE that Defendant Valeant Pharmaceuticals International, Inc., n/k/a Bausch Health Companies, Inc. (“Valeant” or the “Company”), respectfully moves for a protective order precluding plaintiffs in the above-captioned opt-out actions (“Plaintiffs”) from deposing the Company’s current Chief Executive, Officer Joseph C. Papa.

Valeant’s motion is based on the accompanying memorandum of law, the declaration of Richard Hernandez and all attached exhibits, and such further evidence and argument as may be requested or permitted by the Court on this motion.

Dated: March 5, 2021

McCARTER & ENGLISH, LLP

/s/ Richard Hernandez

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Respectfully submitted,

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International, Inc.*

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20-cv-07462 (MAS) (LHG)

**[PROPOSED] ORDER GRANTING DEFENDANTS' MOTION FOR A PROTECTIVE
ORDER TO PRECLUDE THE DEPOSITION OF JOSEPH C. PAPA**

THIS MATTER having been brought before the Court by Defendant in the above-captioned actions for a Protective Order precluding the deposition of Joseph C. Papa; and the Special Master having considered the papers submitted; and the Special Master having heard the arguments of counsel, if any;

IT IS, on this _____ day of _____, 2021;

ORDERED that Defendant Valeant's motion is GRANTED

Dennis M. Cavanaugh, U.S. D. J. (Ret.)